

## CHRONOLOGY OF EVENTS

WRIGHT' DISPOSAL, INC.  
SUCKLA FARMS #1  
EPA PERMIT No. CO1516-02115

- Sept. 27, 1989 - Tour of Suckla Farms #1 injection well (Class II) facility by EPA and COGCC representatives Marc Herman, Arnold Boettcher, and Ed DiMatteo.
- Sept. 27, 1989 - Class I Permit Application submitted by Wright's Disposal, Inc. for Suckla Farms #1 injection well.
- Oct. 4, 1989 - EPA letter to Wright's acknowledging receipt of their Class I permit application.
- Oct. 28, 1989 - Copy of letter from Wright's to Weld County Commissioners describing the Suckla Farms #1 facility and their intention to operate the well as a Class I injection well.
- Oct. 30, 1989 - Paul Osborne review summary of Wright's Class I permit application.
- Jan. 6, 1990 - EPA letter to Wright's acknowledging receipt of additional permit application data and request for additional items.
- Jan. 26, 1990 - Copy of letter from Wright's to landowner Frank Suckla notifying him that a Class I permit had been applied for with EPA.
- Feb. 2, 1990 - Letter from Wright's to EPA with lab analysis of Class I fluids proposed for injection.
- Feb. 28, 1990 - Memo from Tom Pike to Donna Perla requesting RCRA evaluation of lab analysis of Class I fluids submitted by Wright's.
- Mar. 20, 1990 - Chuck Tinsley attended a hearing at the Weld County Planning Commission concerning Wright's proposed Class I well. Ten citizens attended and stated their objections.
- Sept. 5, 1990 - Received Memo from Tom Burns with RCRA to Tom Pike with evaluation of potential Class I fluids submitted by Wright's for injection.

Jan. 22, 1991 - Received Cenref Labs analysis of injection fluids injected in Suckla #1 Farms well.

Feb. 4, 1991 - Letter from EPA to Wright's advising that Class I permit application was administratively complete.

Mar. 6, 1991 - Phone call from Keith Schuett requesting status of Wright's permit.

Mar. 21, 1991 - Memo from Paul Osborne with suggestions for revisions to draft permit in progress.

May 16, 1991 - Letter from Wright's to EPA with list of five potential sources of Class I fluids.

Jul. 3, 1991 - Received listing from Wright's of all companies that deliver Class II brine fluids to Suckla Farms #1. Also list of four potential Class I sources.

Aug. 15, 1991 - EPA Issued Wright's Class I Draft Permit with Cover Letter, Statement of Basis, and Public Notice.

Aug. 16, 1991 - Phone call from Mike Neilson with Ft. Lupton newspaper inquiring if PN for draft permit was to be published as a paid legal notice. Yes.

Aug. 21 to Sept. 20, 1991 - Received 16 written comments from public during 30-day public notice period following issuance of draft permit.

Nov. 8, 1991 - Phone call from Farmer and Miner newspaper in Ft. Lupton inquiring if the public notice regarding the public hearing in Greeley should be published. Said no, as no publication order had been sent to them.

Nov. 12, 1991 - Mail-out of letters to commenters on Draft Permit and other interested parties notifying them of a Public Hearing to be held on Dec. 5, 1991, at the University of Northern Colorado in Greeley.

Nov. 29 to Dec. 4, 1991 - Received three phone calls commenting on Draft Permit (received after end of 30-day public notice period).

- Dec. 5, 1991 - EPA held public hearing from 7:00 to 9:00 PM in the Long's Peak Ballroom at the University Center, University of Northern Colorado in Greeley. Presiding Officer Al Smith, along with Tom Pike, Paul Osborne, John Carson, and Daniela Thigpen.
- Dec. 6 to  
Dec. 21, 1991 - Received thirteen (13) written comments from public during the 15-day public notice period following the public hearing.
- Dec. 12, 1991 - Phone call from Mary George with The Denver Post requesting some details about Suckla Farms #1 well for possible article for publication.
- Dec. 16, 1991 - Errol Lawrence with Geraghty & Miller reviewed all data in our files of Suckla Farms #1.
- Dec. 19, 1991 - Attorney Adam Babich reviewed all data in our files of Suckla Farms #1.
- Jan. 3, 1992 - Phone call from Paul Day with TV Channel 4 advising that a news team would be at Suckla Farms #1 well site today.
- Jan. 16, 1992 - Phone call from one commenter (received after 15-day public notice period following public hearing).
- Jan. 23, 1992 - Phone call from Adam Babich requesting copies of all written comments submitted from public. Sent copies same day.
- Jan.-May, 1992 - Prepared Final Permit and Responsiveness Summary for Suckla Farms #1.
- Feb. 24, 1992 - Phone call from Robert Fullop with Wright's with additional information about injection zone characteristics.
- Apr. 4, 1992 - Staff meeting with Max Dodson concerning revisions to Final Permit and Responsiveness Summary. Decided to add provision for a semi-annual environmental audit of well site surface facilities.
- May 19, 1992 - EPA letter to National Earthquake Information Center. Request for past earthquake data within 300 km radius of Suckla Farms #1.

- May 25, 1992 - Received earthquake data from National Earthquake Information Center.
- Jun. 16, 1992 - Issued Final Permit for Suckla Farms #1, along with cover letter, Revised Statement of Basis, Responsiveness Summary, and Public Notice.
- Jun. 16, 1992 - Mail-out of Responsiveness Summary (26 pages), with cover letter, and instructions for submitting petition to Headquarters. Sent to 62 commenters on Draft Permit, including those who attended the Public Hearing.
- Jun. 26, 1992 - Phone call from Adam Babich requesting copies of Final Permit, Cover Letter, Public Notice, and Revised Statement of Basis. Sent same day.
- Jul. 2, 1992 - Received FAX from Radian Corp. concerning submittal of bid to Wright's to conduct proposed Environmental Audit of Suckla Farms #1.
- Jul. 9, 1992 - Phone call from Keith Schuett with Weld County requesting mailing addresses of Wright's and landowner Frank Suckla.
- Jul. 9, 1992 - Received letter from Wright's outlining procedure for conducting Environmental Audit for approval.
- Jul. 20, 1992 - Received letter from attorney Adam Babich with copy of petition submitted to Headquarters on behalf of Suckla Farms, Inc. (petition dated July 17, 1992).
- Jul. 27, 1992 - Received copy of letter from Adam Babich to Wright's advising that Final Permit was being appealed, and not to inject Class I fluids.
- Jul. 28, 1992 - Received copy of letter from Headquarters to Thomas Speicher requesting Index of Administrative Record. Also contained petition submitted by City of Ft. Lupton.
- Jul. 31, 1992 - EPA letter to Wright's notifying that Final Permit decision was being appealed, and that Suckla Farms #1 was not authorized to inject Class I fluids.
- Aug. 4, 1992 - Prepared Chronology and preliminary Index of Administrative Record for Regional Counsel.

Aug. 10, 1992 - Received copy of letter from Headquarters to Thomas Speicher (dated Aug. 6) requesting Index of Administrative Record. Also contained petition submitted by Suckla Farms, Inc.